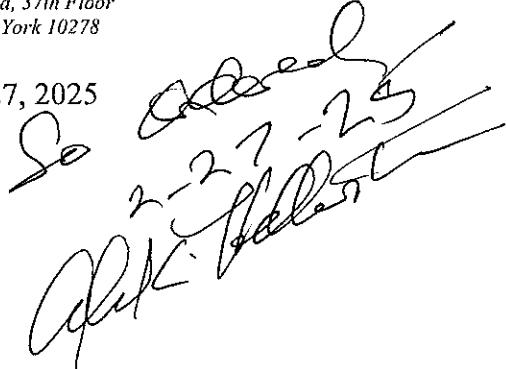




United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

February 27, 2025



VIA ECF

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. David Hu and Martin Silver, 20 Cr. 360 (AKH)*

Dear Judge Hellerstein:

The Government writes to respectfully request that the Court order that the Government may provide counsel for a victim with redacted versions of the Schedule of Victims, currently under seal, accompanying the Order of Restitution for defendant David Hu and the Order of Restitution for defendant Martin Silver (together, the "Schedules of Victims"). Specifically, counsel for victim Alpha Alternative Fund Ltd. ("Alpha Fund") has requested a copy of the Schedules of Victims showing the identity of and loss to Alpha Fund for Alpha Fund's use. Although the Schedules of Victims are under seal because they contain confidential information about the identities and losses of individual victims in this case, the Government does not object to Alpha Fund's request that it be provided with the information about Alpha Fund reflected in the Schedules of Victims. Indeed, the Court granted a similar request made by counsel for victim Girobank, N.V. *See* Dkt. 131 (ordering that the Government provide Girobank N.V. "a redacted version of each Schedule of Victims as to both defendants Martin Silver and David Hu," and that the documents "will be unsealed for purposes of Girobank's use only.").

Accordingly, the Government respectfully requests that the Court order that the Government may provide counsel for Alpha Fund with a redacted version of each Schedule of Victims, respectively, as to defendants David Hu and Martin Silver, where other victim information is redacted but Alpha Fund, the amount owed to Alpha Fund, and total loss amount information is visible, and that such a redacted document will be unsealed for purposes of Alpha Fund's use only.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: /s/ Negar Tekeei
Negar Tekeei
Assistant United States Attorney
(212) 637-2482

Cc: Counsel to parties and victims (via ECF and Email)